

From: Miller, Garyg
Sent: Saturday, September 9, 2017 9:14 AM
To: Sanchez, Carlos; Coltrain, Katrina; Coats, Janetta; Peterson, Mary
Cc: Meyer, John; Edlund, Carl; Opalski, Dan; Gray, David; Carroll, Craig
Subject: FW: Final follow up... Inspections of SJRWP - questions

Please see draft responses.

Thanks,

Gary Miller
Remedial Project Manager
EPA Region 6 Superfund Division, TX/Ark Section
214-665-8318
miller.garyg@epa.gov

1. How can one state that “the liner is in place” and “we don’t have an indication that the underlying waste materials have been exposed” when you have not been able to completely inspect all portions of the cap?

The description of the cap was based on an initial visual inspection by EPA of the portions of the cap that were above the water. For the cap areas under water, multiple investigations are being conducted now by the PRPs under EPA oversight to confirm the cap integrity. Those investigations include topographic surveys, bathymetric surveys, and manual probing of both above water and below water areas of the cap. The manual probing is being conducted by the PRPs under the oversight of a representative of the EPA Dive Team. Sediment samples and surface water samples were collected on 9/7/17 for a quick turn-around analysis (5 days, fastest that the lab could perform) for dioxins and furans. These investigations will be completed next week, and the results will be followed up and confirmed by underwater investigations by the EPA Dive Team. The surveys & probing will be completed next week and the Dive Team will perform their inspections then as well, weather permitting. The EPA Dive Team will sample the sediment in any underwater cap areas where the armor stone is missing.

2. How can one suggest that no waste materials have been exposed when the NW quadrant of the cap has no liner?

The NW area is covered and isolated by the armor cap in that area. The NW cap includes a mixture of much smaller rock and gravel there, in addition to the larger armor stone, to prevent the migration of the underlying waste material through the cap. This serves the same purpose as the geotextile liner used in the other areas of the cap. The geotextile could not be used in the NW area because the steep slope there coupled with the relative slickness to the liner would increase the tendency of the armor stone to slide down-hill.

3. I am worried that rock will be placed over areas of the cap where there might be problems BEFORE you can complete thorough inspections. Will EPA be able to properly inspect for actual damages to the cap before portions are covered up by rock?

Yes. The rock is being placed areas either (1) where the geotextile liner is intact and therefore isolating and containing the waste material, or (2) on the tops & backsides of the southern berm that is outside of

the pits. Further, sediment samples have already been collected from the top of the cap under EPA oversight with analysis for dioxins & furans. For the underwater areas, any exposed areas found will be sampled by the EPA Dive Team prior to covering the areas with rock.

4. How can one tell if sampling will truly be able to assess whether toxins have been released? Are you sure you know where to sample? How do you know where floodwaters of this magnitude and variables in current vectors, may have transported any waste material? Will the sampling locations be representative of the situation?

The sediment sampling locations are distributed over the cap to assess whether there is a high dioxin and furan level there. The samples to be collected in the underwater areas by the EPA Dive Team will determine whether there is a high dioxin and furan level been exposed to the river. These samples will not be able to determine how much dioxin, if any, was released to the river, only that it was exposed with the potential for a release.

5. I have not seen evidence of successful fish and crab tissue sampling prior to this event. I know that EPA tried to sample some killifish in the wake of the late 2015/early 2016 cap problems being discovered. Even if you had sampled some killifish, how do you know for sure that contamination had not been released, and is still being released, to fish and crab? How can you know for sure that more dioxin has not gotten into the food chain?

The sampling described previously will determine the current situation and the potential for a release. Additional fish sampling will be conducted during the Remedial Design to assess the situation at that time. However, the EPA recommends that everyone adhere to the fish consumption advisories in place due to the other sources of contaminants in the San Jacinto River.

6. Drone footage from sometime since the weekend captured the attached image. If you look in the middle of the image, you see bluish looking material of some sort. When I first saw it, I thought it was liner, but when I zoom in, it appears to be a viscous bluish material. It's hard to tell. I hope that you have been able to confirm what that material is.

No viscous dark material has been observed on the cap. It is not clear what the image may be showing, but in the past organic material from the river has had a dark appearance. The paper-mill waste in the waste pits generally has a grayish color as seen in the attached photograph taken prior to the installation of the cap.



From: Peterson, Mary

Sent: Friday, September 08, 2017 5:45 PM

To: Sanchez, Carlos <sanchez.carlos@epa.gov>; Miller, Garyg <Miller.Garyg@epa.gov>; Coltrain, Katrina <coltrain.katrina@epa.gov>; Coats, Janetta <coats.janetta@epa.gov>

Cc: Meyer, John <Meyer.John@epa.gov>; Edlund, Carl <Edlund.Carl@epa.gov>; Opalski, Dan <Opalski.Dan@epa.gov>; Gray, David <gray.david@epa.gov>; Carroll, Craig <Carroll.Craig@epa.gov>

Subject: FW: Final follow up... Inspections of SJRWP - questions

Gary, Carlos, and Katrina,

Please see the email string below and prepare a draft response as soon as possible. Please provide the draft response to the people on this email distribution for review. Thanks for your prompt attention to this.

Mary P. Peterson, Director

Superfund Division

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Cleaning Up & Restoring the Heartland

Under the foundational principles of integrity, sound science, & rule of law,
we value: *Accountability* ★ *Teamwork* ★ *Service* ★ *Respect*

From: Crossland, Ronnie

Sent: Friday, September 08, 2017 5:04 PM

To: Edlund, Carl <Edlund.Carl@epa.gov>; Gray, David <gray.david@epa.gov>; Peterson, Mary <Peterson.Mary@epa.gov>; Carroll, Craig <Carroll.Craig@epa.gov>

Subject: RE: Final follow up... Inspections of SJRWP - questions

Carl,

Is this last question also associated SJ?

Thanks,
Ronnie

From: Coleman, Sam

Sent: Friday, September 08, 2017 5:24 PM

To: Edlund, Carl <Edlund.Carl@epa.gov>; Gray, David <gray.david@epa.gov>; Peterson, Mary <Peterson.Mary@epa.gov>; Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Carroll, Craig <Carroll.Craig@epa.gov>

Subject: Fwd: Final follow up... Inspections of SJRWP - questions

Please look into this?

Samuel Coleman, P. E.,
Deputy Regional Administrator

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Sent from my iPhone

Begin forwarded message:

From: "Scott Jones" <sjones@galvbay.org>
To: "Miller, Gary" <Miller.Garyg@epa.gov>, "Walters, Donn" <walters.donn@epa.gov>, "Sanchez, Carlos" <sanchez.carlos@epa.gov>, "Edlund, Carl" <Edlund.Carl@epa.gov>, "Coleman, Sam" <Coleman.Sam@epa.gov>
Cc: "Bob Stokes" <bstokes@galvbay.org>, "rock owens" <Rock.Owens@cao.hctx.net>, "Allen, Bob (PCS)" <Bob.Allen@pcs.hctx.net>, <Bob.Allen@pcs.hctx.net>, <jyoung@txhea.org>, <jyoung@txhea.org>, <crystal.taylor@tceq.texas.gov>, <crystal.taylor@tceq.texas.gov>, <Katie.Delbecq@tceq.texas.gov>, <Katie.Delbecq@tceq.texas.gov>
Subject: Final follow up... Inspections of SJRWP - questions

Dear Gary, Donn, Carlos, Carl, and Sam-
My apologies for the multiple emails. I forgot one other important item...

Drone footage from sometime since the weekend captured the attached image. If you look in the middle of the image, you see bluish looking material of some sort. When I first saw it, I thought it was liner, but when I zoom in, it appears to be a viscous bluish material. It's hard to tell.

I hope that you have been able to confirm what that material is.

Can you please add that to my inquiry list from the emails below?

Thanks-
Scott

Scott A. Jones
Director of Advocacy

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Dear Gary, Donn, Carlos, Carl, and Sam-
I am sending a second follow up to my original email...

As a member of the SJRWP Community Awareness Committee, Galveston Bay Foundation would greatly appreciate a response from EPA to our inquiries as to the condition of the cap in the wake of Harvey flooding and the EPA response/investigations/sampling/results to date. If you are not yet able to answer these questions, can you acknowledge that EPA management has received this second follow up message as well as my prior two September 7th messages below?

My new questions:

I understand that contractors are currently placing rock on the cap, including the NW corner where there is no liner. We certainly appreciate a quick response to shore up the damaged temporary cap. However, we are concerned that this may preclude getting a clear picture of any damages the cap incurred and possible loss of waste material to the environment. Therefore, can you tell me if complete inspections and waste/sediment sampling occurred before areas of the cap were covered up?

As of now, I must assume that the waste material in the NW corner, up to 43,700 ppt, was once again exposed to the river waters and was subject to offsite migration, as we saw after lesser storms in late 2015. I hope that is not the case.

We know that EPA has many sites to investigate in the Houston area, but given this site's contents, location and the cap history we think it should rise to the top as far as response and communications. Can you please get back to me and the rest of the CAC members with status update as soon as you can?

Thank you-
Scott

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Hello Again Gary and Donn-

My apologies. In addition to the items below, I also meant to ask if EPA will perform, or oversee the performance, of a new elevation/bathymetry survey in the wake of Harvey.

Thanks-
Scott

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Dear Gary, Donn, and Katie-

I was reading the September 6th TCEQ news update about Hurricane Harvey response activities at <https://www.tceq.texas.gov/news/releases/09-06-status-of-systems-in-areas-affected-by-harvey>.

I note the following text attributed to EPA/TCEQ:

The San Jacinto Waste Pits site has a temporary armored cap designed to prevent migration of hazardous material; some areas that rock been displaced and liner is exposed. The potential responsible party has mobilized heavy equipment and is placing rock on different places on the armored cap to repair the defensive surface. The liner is in place and functional so we don't have any indication that the underlying waste materials have been exposed. If we find a breach in the exposed liner, we direct the responsible party to collect samples to determine if any materials have been released. Crews continue to surveying portions of the cap that are submerged and the EPA dive teams will survey the cap underwater when conditions allow.

I have some questions that I hope you will answer for me:

1. How can one state that "the liner is in place" and "we don't have an indication that the underlying waste materials have been exposed" when you have not been able to completely inspect all portions of the cap?
2. How can one suggest that no waste materials have been exposed when the NW quadrant of the cap has no liner?
3. I am worried that rock will be placed over areas of the cap where there might be problems BEFORE you can complete thorough inspections. Will EPA be able to properly inspect for actual damages to the cap before portions are covered up by rock?
4. How can one tell if sampling will truly be able to assess whether toxins have been released? Are you sure you know where to sample? How do you know where floodwaters of this magnitude and variables in current vectors, may have transported any waste material? Will the sampling locations be representative of the situation?
5. I have not seen evidence of successful fish and crab tissue sampling prior to this event. I know that EPA tried to sample some killifish in the wake of the late 2015/early 2016 cap problems being discovered. Even if you had sampled some killifish, how do you know for sure that

contamination had not been released, and is still being released, to fish and crab? How can you know for sure that more dioxin has not gotten into the food chain?

Can you please provide answers to these questions?

Finally, can you provide a site update, regarding inspections and findings in the wake of the flood event?

I appreciate the work you are doing.

Thanks-
Scott

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